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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems and)
Their Impact Upon the Existing)
Television Broadcast Service)

MM Docket No. 87-208

LATE FILED COMMENTS OF ABACUS TELEVISION

Let me begin by thanking the Commission for the honor and privilege to be included among this panel of guests invited to address Market Entry Barriers for Small Business in the telecommunications industry, particularly minorities and women.

In keeping with the stated objectives of this panel, I would like to take this brief opportunity to tell you about my business and the direct affect the Commission's actions will have on affected minority businesses, such as myself, in the Low Power Television industry. Or "Community Broadcasters," as we like to be called.

I established Abacus Television over seven (7) years ago in response to the opportunity LPTV licenses offered. Numerous large markets that had been previously closed to new television licenses for many years, because the frequencies available for full power television stations had been exhausted in the 1960's had sufficient residual spectrum to accommodate LPTV applications. I conceived and executed a plan to develop a network of LPTV stations covering the greater Pittsburgh, PA ADI and three smaller adjacent television markets. To date I have received or purchased 16 LPTV Construction Permits. I built my first station 18 months ago, my

second station 12 months ago, my third station 6 months ago and I have my fourth, fifth, and sixth station under construction now.

Succinctly, Community Television Broadcasters use pieces of spectrum too small to accommodate a full power television station to build small television stations, on a secondary basis, to provide more locally oriented programming and/or lower television advertising rates. In 1982, the FCC authorized LPTV specifically to provide specialized services in predominantly minority and other underserved communities. Community Broadcasters provide over-the-air services to homes with standard television sets, in precisely the same way as full power television stations. To its viewers it is regular TV. LPTV merely has a broadcast range of only 15 miles compared to a range of 60 miles for full power, on the average.

In total LPTV serves approximately 60 million households from a total of 1,921 license stations. This compares to 1,550 full power stations. (We hold more than 50 percent of the television licenses!) The LPTV industry is composed of approximately 1000 businesses employing 10,000 people as a result of an investment of \$200,000,000, bringing service to 10,000,000 - plus viewers. Not only are Community Broadcasters almost to a person small businesses, but my industry has the highest percentage of minority licensees of any of the Commission's regulated services. This is perhaps, because the Commission included a significant diversification and minority preference in its lottery selection procedures for awarding LPTV licenses.

1996 NTIA study on Minority Commercial Broadcast Ownership

identified a total of 37 commercial television stations as minority owned.¹ Since neither NTIA nor the FCC tracks the minority ownership levels in LPTV Abacus completed its own study in January of 1996. As of that date there were 256 minority owned LPTV authorizations.² In other words 7/8th of the minority owned television stations are LPTV stations. Importantly most of these minority owned stations are concentrated in the spectrally crowded major television markets. In summary Community Broadcasters are exactly what this panel is about.³

In its Sixth Further Notice of Proposed Rule Making, Advanced Television Systems,⁴ the Commission adopted a draft table of allotments for a transition of the existing analog television system to digital television, or "DTV". The Commission further proposed that only full power licensees be among those initially eligible to apply for these new DTV channels. The Commission made its DTV allotment table without regard to whether the DTV channels were already in use by Community Broadcasters. And the Commission proposed only one class of DTV channels and only enough allotments

¹ See Exhibit 1

² See Exhibit 2

³ [W]e reiterate the Commission's statutory obligation to ensure that small businesses, businesses owned by women and minorities, and rural telephone companies (collectively "designated entities") are afforded opportunities to participate in the provision of spectrum-based services. (Citing Omnibus Budget Reconciliation Act of 1993, Pub. L.No. 103-66, Title VI, §6002(a), 107 Stat. 312, 388 (1993) (Budget Act).

⁴ MM Docket No. 87-268, Advanced Television Systems and Their Import upon the Existing Broadcast Service (August 14, 1996), mimeo FCC 96-317.

to accommodate the conversion of each full power station to DTV. Stated plainly, as the proposal now stands Community Broadcasters were left out of the ATV conversion plan and will be virtually destroyed by it.

Initially approximately 45 percent of the LPTV authorizations in the major markets will have DTV authorizations "dropped in" on them. Next TV channels 60 - 69 are to be reallocated to other services. Since Community Broadcast authorizations are the most heavily concentrated on these "least desirable" channels, the proposed reallocation will wipe out another 25 percent of the LPTV stations. Lastly, at the end of the DTV conversion cycle the few remaining LPTV stations will be transmitting in analog to a received set universe that is now digital. If they are not killed off quickly, they will die a slow, costly death. In the major markets where the minority licensees are concentrated and numerous minority audiences receive their only service from Community Broadcasters, the displacement effect will be the worst. With more full power stations to accommodate and greater demand by newcomers, I expect virtually all of the existing LPTV stations to subcome to the Commissions's proposal.

It is not too late to correct this disastrous error. For a Commission that wants to encourage diversification in mass media ownership, minority participation in telecommunications and encourage small businesses, unnecessarily destroying the LPTV industry is schizophrenic. The Telecommunications Act of 1996 identifies "television licensees" as the group the Commission

should make initially eligible for DTV allotments. The Act did not specify full power licensees only.⁵ Section 101 of the Telecommunications Act of 1996 charged the Commission with eliminating barriers for small business and minorities in the provision and ownership of future telecommunications services.⁶ LPTV is nothing but small businesses and minorities. The Sixth Further Notice suggests some areas where the DTV allotment proposal could be adjusted to make room for Community Broadcasting.⁷ All the Commission need do is ignore the anti-competitive comments against such accommodation and act in that greater Public interest.

The Commission should propose multiple classes of DTV allotments. Full power ones and in between those smaller ones, much as the LPTV industry has demonstrated is feasible in the analog world. The Commission should open a second window for these smaller DTV allotments and designate LPTV licensees as the only initial eligibles. LPTV licensees that undertake the expense of building DTV channels with these new, smaller allotments should be elevated to primary status, but charge with all of the obligations of a Part 73 licensee. Lastly, the FCC should use the full panoply of solutions proposed by the LPTV industry in their comments during earlier stages in the ATV proceeding to protect as many of the

⁵ See Exhibit III; See also Telecommunications Act of 1996, Sec. 201, 47 U.S.C. §336 (a)(1) (January 31, 1996). Pub.L.No. 104-104, 110 Stat. 56

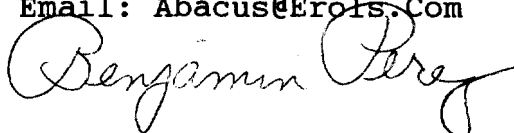
⁶ Id. Sec. 101, 47 U.S.C. §257 (January 31, 1996).

⁷ Id. note 4, at paragraphs 64-72.

existing LPTV authorizations as possible and to accommodate as many of those businesses with DTV conversion channels as feasible.⁸

Again, thank you for hearing my comments.

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A handwritten signature in cursive script that reads "Benjamin Perez". The signature is written in black ink and is positioned below the typed contact information.

⁸ See, e.g., Exhibits IV and V.

EXHIBIT 1

MINORITY COMMERCIAL BROADCAST OWNERSHIP



***MINORITY COMMERCIAL BROADCAST OWNERSHIP
IN THE UNITED STATES***

***The Minority Telecommunications Development Program
National Telecommunications and Information Administration
United States Department of Commerce***

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Assistant Secretary for Communications and Information***

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Acknowledgements

The Minority Telecommunications Development Program wishes to thank Fred Brown of the National Association of Black Owned Broadcasters, Francisco R. Montero of the law firm of Fisher Wayland, and others who contributed to this project.

EXECUTIVE SUMMARY

The National Telecommunications and Information Administration (NTIA), an agency of the U.S. Department of Commerce, is the Executive Branch's principal advisor on domestic and international telecommunications and information technology issues. In 1978 NTIA established the Minority Telecommunications Development Program (MTDP) to assist in the development of programs and policies that increase minority ownership of broadcast, telecommunications and information businesses, and to provide policy advice with respect to legislation and regulations which affect minority business participation in the telecommunications and information industries. MTDP has collected data on minority ownership of commercial radio and television stations in the United States annually since 1990. MTDP provides this data to the public and uses it to help develop program initiatives and policies. The data encompasses commercial AM and FM radio stations as well as commercial UHF and VHF television stations. MTDP conducts this research to determine the extent of minority ownership of commercial broadcast stations and to track changes in ownership from year to year.

Minority participation in the broadcast, telecommunications and information industries is desirable for several reasons. Diversity of ownership fosters a variety of viewpoints, provides an opportunity for multicultural expression and awareness, and helps bring focus, with sensitivity, to issues of particular importance to discrete communities. Because minority-owned firms tend to hire minorities more often than do non-minority-owned firms, minority ownership fosters minority employment, often in management and professional positions. Also, to the extent that investment capital goes to entrepreneurs less credit-worthy than potential minority entrepreneurs, the economy misallocates its resources and reduces overall societal welfare.

Minority Ownership List. For purposes of this minority broadcast ownership list, MTDP deems "minority ownership" to exist when blacks, hispanics, asian-americans, native americans, or any combination thereof (1) own more than 50 percent of a broadcast corporation's stock, (2) have voting control in a broadcast partnership, or (3) own a broadcasting property as an individual proprietor.

Survey Results. In 1995, the number of minority-owned commercial broadcast stations increased, though not significantly.

- Minority-owned AM radio stations decreased by five from 180 to 175 stations.
- Minority-owned FM radio stations increased by six from 112 to 118 stations.
- Minority-owned television stations increased by six from 31 to 37 stations.
- Overall, there were 293 minority-owned radio stations and 37 minority-owned TV stations in the country, which represented 2.9% of all commercial broadcast stations -- a percentage that has remained relatively constant since 1992.

Factors Affecting Minority Ownership. This year, in addition to the level of ownership, MTDP sought to understand more about the nature of the assets owned by minority radio broadcasters and to identify more precisely the barriers to ownership. MTDP found that, on average, minorities own broadcast properties with technical characteristics (frequency band and signal power) inferior to those of non-minority owners, thus reaching fewer listeners, generating less advertising revenue, and, at least in the case of black-owned stations, appearing to serve a less affluent segment of the community. These results suggest that, lacking sufficient access to capital, minority broadcasters are more likely to purchase less lucrative stations. This confirms our earlier research in NTIA's 1995 report entitled Capital Formation and Investment in Minority Business Enterprises in the Telecommunications Industries (Telecap) which concluded that lack of access to capital is the primary impediment to minority business formation.

An analysis of variation in the number of radio broadcasters in each state and in each of the top hundred markets (the number of minority-owned television stations was too small to permit meaningful analysis) shows that, where the network of minority financing is best developed, there are higher numbers of minority broadcasters. MTDP measured the availability of financing using a variable to indicate whether a market contains a black-owned bank. The existence of a black-owned bank is an indication that the institutional and informal arrangements necessary to mobilize significant amounts of capital to minority entrepreneurs is in place.

Policy Implications. MTDP sought to compare different economic development approaches designed to increase minority participation in the broadcast industry in an effort to identify those that provide the greatest impact. Our research indicates that to promote minority ownership, policies that help mobilize sufficient capital to credit-worthy minority entrepreneurs are required. This analysis shows that industry-specific development programs have a greater impact in fostering minority ownership in the capital-intensive broadcast industry than do broad-based initiatives not specifically designed for this purpose. Frequently an entrepreneur must raise capital in the millions of dollars. Effective policy tools, therefore, must enable capital mobilization on this large scale. Programs like the Community Reinvestment Act, which was designed, in part, to help provide capital to small business owners across all sectors of the economy, are unlikely to meet this requirement. In contrast, anecdotal and statistical evidence shows that, for example, the Federal Communications Commission's (FCC) tax certificate program positively impacted minority ownership. Although this program has been eliminated by Congress, the underlying objectives that that program was intended to promote are still worth pursuing. The effort to ensure increased access to sufficient capital for acquisition of properties in this particular industry is the key to increased participation. As we noted in Telecap, start-up capital in many minority communities, often characterized by higher unemployment, underemployment, and lower discretionary income and savings, is scarce. We outlined a number of strategies intended to strengthen the formal and informal arrangements that increase capital aggregation and mobilization. This study confirms that, where these arrangements have been best developed, minority investment in broadcast properties is more likely.

In addition to specific initiatives, the U.S. Department of Commerce encourages majority/minority partnering to increase the number of minority entrepreneurs and minority-owned businesses in the telecommunications and information industries. We believe that such partnerships are essential to the expansion of minority businesses. Recently, the Department of Commerce participated in the signing of a \$33 million refinancing of Pepsi-Cola of Washington, D.C., L.P., the largest minority-controlled Pepsi franchise in the world. NationsBank partnered with four minority-controlled banks in the refinancing: Industrial Bank of Washington, First Southern Bank of Atlanta, Harbor Bank of Maryland and City National Bank of New Jersey. This financing package is significant because it symbolizes the importance of majority/minority partnerships in expanding opportunities for minority businesses. The Administration will continue to examine ways of increasing opportunities for disadvantaged and underserved groups and communities, including minorities. In particular, we will examine how best to promote majority/minority partnerships in telecommunications that would be particularly beneficial in assisting minorities to overcome obstacles to access to capital.

I. Current Levels of Minority-Owned Commercial Broadcast Stations

In 1995 minority ownership of commercial broadcast stations increased by seven. Although minority-owned AM radio decreased by 5 stations, FM radio increased by 6 stations. The number of minority-owned television stations increased by 6. Thus, minorities own 293 commercial radio and 37 commercial television stations. However, given the increase in the number of commercial stations in the industry, the percentage of commercial radio and television broadcast stations owned by minorities remained at 2.9%, a percentage that has remained constant since MTDP began collecting data (Tables 1 and 2). In terms of race, black ownership of FM radio and television stations increased by 12 (6 in FM radio and 6 in television); ownership of AM radio decreased by 2. Hispanics own 4 fewer AM radio stations, 1 less FM radio station, and the same number of television stations. Asian-American ownership increased by 1 AM station and remained unchanged in FM radio and in television. Native-American ownership increased by 1 FM radio station.^{1/}

^{1/} MTDP updates the information in the list from previous years based on information from various sources and periodicals, and contacts each station to verify its ownership. The Federal Communications Commission (FCC) does not require broadcast licensees to identify their race or ethnicity. This methodology does not ensure a complete listing of all U.S. commercial radio and television stations owned by minorities. Thus, it is difficult to determine whether additional stations should have been included in this compilation. Input from the private sector is, therefore, invaluable and any corrections to the current list would be appreciated.

This sampling methodology should not, however, adversely affect the statistical results presented below. Because we attempt to sample the universe of minority-owned stations, our regression results and station profiles are quite reliable. Indeed, we could have obtained similar results had we used a smaller sample of minority-owned broadcast stations.

Table 1. ^{2/} MINORITY-OWNED COMMERCIAL BROADCAST STATIONS LICENSED IN THE UNITED STATES IN 1995					
INDUSTRY TOTALS	BLACK	HISPANIC	ASIAN	NATIVE AMERICAN	MINORITY TOTALS
AM Stations 4,906	99 2.0%	72 1.5%	2 .04%	2 .04%	175 3.6%
FM Stations 5,285	77 1.5%	34 .64%	3 .06%	4 .08%	118 2.2%
TV Stations 1,221	27 2.2%	9 .74%	1 .08%	0 0%	37 3.0%
Cumulative Totals* 11,412	203 1.8%	115 1.0%	6 .05%	6 .05%	330 2.9%

^{2/} Industry totals based on information from the Federal Communications Commission, Public Service Division October 31, 1995. All figures are rounded to the nearest tenth of a percent.

Table 2. ^{3/} MINORITY OWNED COMMERCIAL BROADCAST STATIONS LICENSED IN THE UNITED STATES IN 1993, 1994 & 1995												
		Industry Totals	Minority Totals		Black		Hispanic		Asian		Native American	
1993	AM	4,950	175	3.5%	110	2.2%	63	1.3%	0	0%	2	.04%
	FM	4,920	99	2.0%	71	1.4%	23	.5%	2	.04%	3	.06%
	TV	1,151	28	2.4%	19	1.7%	8	.7%	1	.1%	0	.4%
	Total	11,021	302	2.7%	200	1.8%	94	.9%	3	.03%	5	.05%
1994	AM	4,929	180	3.7%	101	2.2%	76	1.5%	1	.02%	2	.04%
	FM	5,044	112	2.2%	71	1.4%	35	.7%	3	.06%	3	.06%
	TV	1,155	31	2.7%	21	1.8%	9	.8%	1	.09%	0	0%
	Total	11,128	323	2.9%	193	1.7%	120	1.1%	5	.04%	5	.04%
1995	AM	4,906	175	3.6%	99	2.0%	72	1.5%	2	.04%	2	.04%
	FM	5,285	118	2.2%	77	1.5%	34	.6%	3	.06%	4	.08%
	TV	1,221	37	3.0%	27	2.2%	9	.7%	1	.08%	0	0%
	Total	11,412	330	2.9%	203	1.8%	115	1.0%	6	.05%	6	.05%

3/ Industry totals are based on information from the Federal Communications Commission, Public Service Division: August 31, 1993; June 30, 1994 and October 31, 1995. All figures are rounded to the nearest tenth of a percent,

Willie D. Davis

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All Pro Broadcasting, Inc.

KCKC-AM (News, Talk)

KAEV-FM (Urban Contemporary)

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San Bernadino, CA 92410

909/ 882-2575

Evelyn Rogers

President

The Dunlin Group

KJMY-FM (Jazz)

401 Alvarado Street

Suite 200

Monetrey, CA 93940

Television

W. Don Cornwell

CEO

Granite Broadcasting

KNTV-TV Channel 11

645 Park Avenue

San Jose, CA 95110

408/ 286-1111

W. Don Cornwell

CEO

Granite Broadcasting

KSEE-TV Channel 24

5035 East McKinley Avenue

Fresno, CA 93726

209/ 454-2424

COLORADO Radio

James Walker

President

People's Wireless, Inc.

KDKO-AM (Black Contemporary)

2559 Welton Street

Denver, CO 80205

303/ 295-1225

CONNECTICUT Radio

John Merchant

President

Hartcom, Inc.

WKND-AM (Black Contemporary)

P.O. Box 1480

Windsor, CT 06095

203/ 688-6221

DELAWARE Radio

Herman Stamps

President

Anchor Broadcasting

WSBL-FM (Jazz)

55 W. Church Street

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320/ 436-9726

DISTRICT OF COLUMBIA Radio

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Radio One Broadcasting Co.

WKYS-FM (Urban Contemporary)

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202/ 686-9300

Cathy Hughes

President

Radio One Broadcasting Co.

WOL-AM (News, Talk)

WMMJ-FM (Black Soul)

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202/ 675-4800

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Howard University Radio
WHUR-FM (Black Contemporary)
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Sunao Broadcasting Co., Inc.
WRBD-AM (Rhythm & Blues)
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Bishop L.E. Willis
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Willis Broadcasting
WSVE-AM (Religious)
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Charles Cherry
Chairman
PSI Communications, Inc.
WPUL-AM (Black Contemporary)
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WJIZ-FM (Solid Gold)
506 West Olgethorpe Blvd.
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912/ 883-5397

Brady Keys, Jr.
President
Keys Communications Group, Inc.
WJYZ-AM (Oldies, Gospel)
2700 North Slappey Blvd.
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912/ 436-0112

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WFXE-FM (Urban Contemporary)
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912/ 236-9926

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Cathy Hughes
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Television

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HAWAII Radio

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ILLINOIS Radio

Wesley W. South
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WSDR-AM (News/Talk)
WZZT-FM (Alternate Rock)
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KENTUCKY Radio

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LOUISIANA Radio

Peter Moncrieffe
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MINNESOTA Television

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MISSISSIPPI Radio

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Television

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TV-3, Inc.
WLBT-TV Channel 3
715 S. Jefferson Street
Jackson, MS 39202
601/ 948-3333

MISSOURI Radio

Ragan Henry
President
US Radio, LP
KISF-FM/KCTE-AM (Nostalgia)
10841 East 28th Street
Independence, MO 64052
816/ 254-1073

Michael Carter
President
Carter Broadcasting Group, Inc.
KPRT-AM (Gospel)
KPRS-FM (Urban Contemporary)
11131 Colorado Avenue
Kansas City, MO 64137
816/ 763-2040

Bill White
President
Bronco Broadcasting Co. Inc.
KIRL-AM (Jazz, Religious, Talk)
3713 Highway 94 North
St. Charles, MO 63301
314/ 946-6600

Television

Michael Roberts
Chairman
Roberts Broadcasting Company
WHS�-TV Channel 46
1408 N. Kingshighway
Suite 300
St. Louis, MO 53113
314/ 367-4600

NEW JERSEY Radio

Ragan Henry
President
Vinrah of New Jersey, Inc.
WCMC-AM (Album Oriented Rock)
WZXL-FM (Album Oriented Rock)
3010 New Jersey Avenue
Wildwood, NJ 08260
609/ 522-1416

NEW YORK Radio

Ronald R. Davenport, Sr.
President
Sheridan Broadcasting Corp
WUFO-AM (Black Adult Gospel)
89 LaSalle Avenue
Buffalo, NY 14214
716/ 834-1080

Pierre M. Sutton
Chairman
Inner City Broadcasting of New York
WLIB-AM (News, Talk)
WBLS-FM (Urban Contemporary)
3 Park Avenue
40th & 41st Floors
New York, NY 10017
212/ 592-0404

Andrew A. Langston
President
Monroe County Broadcasting Co.
WDKX-FM (Urban Contemporary)
683 E. Main Street
Rochester, NY 14605
716/ 262-2050

Sydney Small
Chairman
Unity Broadcasting Network/New York
WWRL-AM (Gospel/Talk)
41-30 58th Street
Woodside, NY 11377
718/ 335-1600

Television

W. Don Cornwell
CEO
Granite Broadcasting
WTVH-TV Channel 5
980 James Street
Syracuse, NY 13203
718/ 845-6100

W. Don Cornwell
CEO
Granite Broadcasting
WKBW-TV Channel 7
7 Broadcast Plaza
Buffalo, NY 14202
716/ 845-6100

Network

Sydney Small
Chairman
NBM Broadcasting Network
463 7th Avenue 6th Floor
New York, NY 10018
212/ 714-1000
(Network not included in count of stations)

NORTH CAROLINA Radio

Willie Walls
President
Ebony Enterprises, Inc.
WVOE-AM (Urban Contemporary)
Route 3, Box 39B
Chadbourn, NC 28431
910/ 654-5621

Bishop L. E. Willis
President
Willis Broadcasting
WGSP-AM (Gospel)
2730 Rozzelles Berry Road
Charlotte, NC 28208
704/ 399-9477

Bishop L. E. Willis
President
Willis Broadcasting
WSRC-AM (Religious)
3202 Guess Road
Durham, NC 27705
919/ 477-7999

Bishop L. E. Willis
President
Willis Broadcasting
WBXB-FM (Gospel)
P.O. Box 765
Edenton, NC 27932
919/ 482-2224

Jim Johnson
President
Johnson Communications
WDAO-AM (Rhythm & Blues)
4309 W. 3rd Street
Dayton, OH 45417
513/ 263-9326

James Taylor
President
Taylor Broadcasting Co.
WJTB-AM (Urban)
105 Lake Avenue
Elyria, OH 44035
216/ 327-1844

OREGON Television

John E. Oxendine
President
Blackstar Communications
KBSP-TV Channel 22
4928 Indian School Road, NE
Salem, OR 97305
503/ 390-2202

PENNSYLVANIA Radio

William C. Anderson
President
KBT Communications, Inc.
WHAT-AM (Talk)
2471 North 54th Street
Philadelphia, PA 19131
215/ 581-5161

Bishop L. E. Willis
President
Willis Broadcasting
WURD-AM (Gospel)
5301 Tacony Street
Box 233
Philadelphia, PA 19137
215/ 533-8900

Ronald R. Davenport
Chairman
Sheridan Broadcasting Network
WYJZ-AM (Oldies)
WAMO-AM/FM (Urban Contemporary)
960 Penn Avenue
Suite 200
Pittsburgh, PA 15222
412/ 471-2181

Ragan Henry
President
US Radio, LP
WRAW-AM (Urban Contemporary)
WRFY-FM (Urban Contemporary)
1265 Perkiomen Avenue
Reading, PA 19602
215/ 376-7173

Television

Eddie Edwards
President
WPTT-Inc.
WPTT-TV Channel 22
P.O. Box 2809
Pittsburgh, PA 15230
412/ 856-9010

Dorothy Brunson
President
Brunson Communication Inc.
WGTW-TV Channel 48
3900 Main Street
Philadelphia, PA 19127
215/ 930-0482

Pierre Sutton
President
Inner City Broadcasting
KSJL-AM (Urban Contemporary)
217 Alamo Plaza
San Antonio, TX 78205
210/ 271-9600

Bishop L.E. Willis
President
Willis Broadcasting
KDFT-AM (Religious)
501 Wynnewood Village
Suite 103
Ferris, TX 75224
214/ 943-8391

Television

Frank E. Melton
President
TV-3, Inc.
KTRE-TV Channel 9
P.O. Box 729
Lufkin, TX 75902
409/ 853-5873

Frank E. Melton
President
TV-3, Inc.
KLTV-TV Channel 7
P.O. Box 957
Tyler, TX 75710
903/ 597-5588

W. Don Cornwell
CEO
Granite Broadcasting
KBVO-TV Channel 42
10700 Metric Blvd.
Austin, TX 78758
512/ 835-0042

UTAH Radio

Ragan Henry
President
US Radio II, Inc.
KUMT-FM (Adult Contemporary)
KMXB-FM (Adult Contemporary)
KCPX-AM (Adult Contemporary)
5282 S. 320 West
Suite D-272
Salt Lake City, UT 84107
801/ 264-1075

VIRGINIA Radio

Eric Reynolds
President
Broadcasting Corp. of Virginia
WTJZ-AM (Gospel)
553 Michigan Drive
Hampton, VA 23669
804/ 723-1270

Ragan Henry
President
US Radio, LP
WOWI-FM (Urban Contemporary)
WSVY-AM/FM (Urban Contemporary)
WJCD-FM (Jazz)
1003 Norfolk Square
Norfolk, VA 23502
804/ 466-0009

Walton Belle/Charles Cummings
Owners
1540 Broadcasting Corp
WREJ-AM (Gospel)
3267 C. Crater Road
Petersburg, VA 23805
804/ 768-0100

James I. Johnson Jr.
President
Tri-City Christian Radio, Inc.
WFTH-AM (Contemporary Gospel)
227 Eastbelt Blvd.
Richmond, VA 23224
804/ 233-0765

Bishop L. E. Willis
President
Willis Broadcasting Co.
WPCE-AM (Inspirational)
WMYK-FM (Adult Contemporary)
645 Church Street
Norfolk, VA 23510
804/ 622-4600

Television

Samuel Carruth
Chairman
Tidewater Christian Communications WJCB-
TV Channel 49
2501 Washington Avenue
6th Floor
Hampton, VA 23607
804/ 838-4949

Theodore M. White
President
Urban Broadcasting Corporation
WTMW-TV Channel 14
2565 Lee Highway
Arlington, VA 22207
703/ 528-0051

WASHINGTON Radio

Patrick Prout
President/General Partner
KUJ Ltd. Partnership
KUJ-AM (Oldies)
KNLT-FM (Adult Contemporary)
830 N. Columbia Center
Suite B2
Walla Walla, WA 99336
509/ 529-8000

WISCONSIN Radio

Willie D. Davis
President
All Pro Broadcasting Co.
WMCS-AM (Adult Contemporary)
WLUM-FM (New Rock)
4222 W. Capitol Drive
Milwaukee, WI 53216
414/ 444-1290

Gerald W. Jones
President
Courier Communications
WNOV-AM (Urban Contemporary)
3815 N. Teutonic Avenue
P.O. Box 0638
Milwaukee, WI 53206
414/ 449-9668

Constance Balthrop
President
UNC Media of Milwaukee
WKKV-FM (Jazz)
2400 S. 102nd Street
Suite 230
West Allis, WI 53227
414/ 321-1007